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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF MARTIE
KUTSCHER IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

1 I, Martie Kutscher, hereby declare as follows:

2 1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record
3 for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of
4 the State Bars of California, New Jersey, and New York. I submit this declaration in support of
5 Facebook’s Administrative Motion to File Under Seal. I make this declaration on my own
6 knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

7 2. On August 2, 2021, the parties agreed that Facebook may file certain portions of the
8 Declaration of Alexander H. Southwell under seal and file any argument and declarations in support
9 of this sealing request within one week.

10 3. Attached as **Exhibit 1** is a true and correct unredacted copy of **Exhibit B** to the
11 August 2, 2021 Declaration of Alexander H. Southwell in Support of Facebook’s Position in the
12 Parties’ July 2, 2021 Letter Brief Regarding ADI Privilege Dispute (the “Declaration”).

13 4. Attached as **Exhibit 2** is a true and correct unredacted copy of **Exhibit C** to the
14 Declaration.

15 5. Attached as **Exhibit 3** is a true and correct unredacted copy of **Exhibit D** to the
16 Declaration.

17 6. I declare under penalty of perjury under the laws of the United States of America that
18 the foregoing is true and correct.

19
20 Executed on August 2, 2021 in Palo Alto, California.

21
22 /s/ Martie Kutscher
23 Martie Kutscher
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